



COLORADO CRANE CONSERVATION COALITION, INC.

Dedicated to the conservation and protection of Sandhill Cranes in Colorado

RECEIVED

July 13, 2017

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BLM VERNAL UT**

U.S. Department of the Interior

Bureau of Land Management

Vernal Field Office

170 S 500 E

Vernal Utah, 84078

Attn: Ester McCollough, Field Manager

Re: Comments Regarding Environmental Assessment, DOI-BLM-UT-GO10-2017-0028-EA

Dear Ms McCollough:

We have reviewed the Environmental Assessment (EA), titled "December 2017 Competitive Oil and Gas Lease Sale" dated June 2017 and have comments pertinent to EA Section 3.3.10 Wildlife: BLM Sensitive Species and Migratory Birds and Section 4.2.10 Wildlife: BLM Sensitive Species and Migratory Birds. Our comments pertain to migratory birds and specifically to Greater Sandhill Cranes and potential impacts associated with the BLM proposed sale and development of Parcel ID UT1217-070 (Parcel 070), which is located north of Jensen, UT.

Parcel 070 is located approximately 3.63 miles north of Jensen at U.S. Highway 40 and is east of and adjacent to the Green River. The western boundary of the proposed 120.04-acre parcel appears, on BLM maps provided in the EA, to be adjacent to the Green River. The parcel is located on private surface lands and much of the parcel is currently in irrigated agricultural grain production.

Background Information

Greater Sandhill Cranes that occupy Parcel 070 and the surrounding area at various times of the year are part of the Rocky Mountain population of Greater Sandhill Cranes. Migratory Greater Sandhill Cranes use the agricultural lands within the proposed lease area primarily during the fall and spring migration. Parcel 070 also serves in the fall as a pre-migration Staging Area for local Utah nesting sandhills and cranes that are beginning fall migration from northern states including Idaho, Wyoming and Montana. The cranes feed in the grain field included in Parcel 070 as well as other adjacent agricultural fields and use nearby Green River sandbars as loafing and critical night roosting sites. Crane numbers are highest in the fall (Late-August-November) and in the



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spring (Mid-February-April).

Sandhill cranes are known to nest in Stewart Lake State Wildlife Area located immediately south of Jensen along the Green River and may nest near Parcel 070. Approximately 0.5 miles south of the southern border of Parcel 070 there is a wetland site immediately east of the Green River, which is approximately 225 acres and supports suitable crane nesting habitat. This wetland has sufficient emergent vegetation and open water, which would be suitable for crane roosting and nesting. No information is currently available to us regarding sandhill crane nesting in this wetland area.

Our concerns regarding sandhill cranes and other migratory birds are presented below.

1. The development of mineral resources in Parcel 070 is likely to have a **significant impact** to the migration corridor of the cranes. It would adversely impact cranes during the time drilling of wells would be occurring and during regular well-site maintenance after the completion of wells. Impacts would include decreased availability of waste grains that the cranes utilize as part of their daily diet during migration. Impact would negatively affect immature (chicks of the year) who are building strength for migration to winter ranges in Colorado and New Mexico. The primary impact would be displacement of cranes due to disturbance and decreased use of the foraging habitat and secure roosting sites that are essential to the cranes. Other impacts would include fragmentation of habitat, noise disturbance, and increased human activity including vehicular traffic and presence of personnel associated with well production.
2. We don't know the locations of night roosting sites along the Green River within several miles upstream and downstream of Parcel 070. Information and a discussion of roosting sites should be included in the EA and addressed in mitigation stipulations, if Parcel 070 is not withdrawn from the sale.
3. The wetland immediately south of the Parcel 070 should be included in the EA discussion and sandhill crane use of the habitat during migration and the nesting season should be included in the EA discussion.
4. Parcel 070 is located within 0.5 mile of the Dinosaur National Monument (the parcel is south of the Monument and on the opposite side of the Green River). The parcel is fully visible from the Monument.



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Recommendations

1. Remove Parcel UT1217-070 from the proposed sale.
2. If Parcel 070 is included in the proposed sale specific development practices that would mitigate impacts to cranes should be included in stipulations that would maximize the protection of sandhill cranes that utilize the habitat in the lease area.
 - a. No site development (drilling, fracturing, pipelines, road construction, etc.) during the migration period for sandhill cranes. This would include August through November and mid-February through April.
 - b. Locate the well site on the far east side of the parcel as far away from the river as possible.
 - c. Conduct crane nesting surveys along the river and the wetland south of Parcel 070 prior to project development.
 - d. Apply Utah Lease Notices for sandhill cranes like the Migratory Bird notice UT-LN-45 that is presented in this mineral lease EA.
3. The BLM and the Utah Division of Wildlife should initiate annual sandhill crane monitoring programs in the area. This would provide information if other mineral parcels are considered in the future in this area.

The Colorado Crane Conservation Coalition, Inc. (CCCC) is dedicated to the conservation and protection of sandhill cranes in Colorado. It is also committed to the preservation, protection and enhancement of sandhill cranes throughout the range of the Rocky Mountain population of sandhill cranes. The CCCC headquarters are in Hayden, CO.

Sincerely,

Nancy Merrill

President, Colorado Crane Conservation Coalition, Inc.

cc: Kent Hoffman, Deputy State Director, Lands and Minerals

Gary Torres, BLM District Manager

Ed Roberson, State Director